

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

---

GREGORY MACLEAN, RICK VALLES,  
 ARDESHIR PEZESHKI, JAMES GIBBS, and  
 RONALD HEMENWAY, *individually and in  
 their representative capacities,*

Plaintiffs,  
 v.  
 WIPRO LIMITED,  
 Defendant.

**Civil Action No. 3:20-cv-3414 (GC) (JBD)**

**AMENDED DISCOVERY  
 SCHEDULE**

In accordance with this Court's December 10, 2024 Order (Dkt. 81), the parties met and conferred on January 5, 2025 regarding how discovery should proceed in this case. The parties have reached consensus and now submit the below joint proposed amended discovery schedule:

<b>Event</b>	<b>Deadline</b>
<b>Non-Expert Discovery Cut-Off</b>	October 15, 2025
<b>Class Certification Motion Filing Deadline<sup>1</sup>  Initial Expert Disclosure &amp; Report Deadline</b>	October 27, 2025
<b>Opposition to Class Certification Motion  Rebuttal Expert Disclosure &amp; Report Deadline</b>	December 3, 2025
<b>Reply in Support of Class Certification Mot. &amp;  Plaintiffs' Rebuttal Expert Disclosure &amp;  Report Deadline</b>	December 31, 2025
<b>Dispositive Motions</b>	March 2, 2026
<b>Responses to Dispositive Motions</b>	April 6, 2026
<b>Replies to Dispositive Motions</b>	April 27, 2026

<sup>1</sup> If a class is certified, the parties may file supplemental expert reports for trial by the Expert Discovery Cut-Off deadline.

Event	Deadline
<b>Expert Discovery Cut-Off</b>	May 18, 2026

We thank the Court for its attention to this matter.

**So Ordered this  
13th Day of January, 2025.**



J. BRENDAN DAY  
UNITED STATES MAGISTRATE JUDGE

Dated: January 10, 2025

By: Jonathan Rudnick

Jonathan Rudnick, Esq.  
LAW OFFICES OF JONATHAN RUDNICK LLC  
788 Shrewsbury Avenue, Suite 204  
Tinton Falls, NJ 07724  
Telephone: (732) 842-2070  
Facsimile: (732) 879-0213  
jonr@ronrudlaw.com

Daniel Kotchen (*pro hac vice*)  
KOTCHEN & LOW LLP  
1918 New Hampshire Ave. NW  
Washington, DC 20009  
Telephone: (202) 471-1995  
Facsimile: (202) 280-1128  
dkotchen@kotchen.com

*Attorneys for Plaintiffs*

Dated: January 10, 2025

By: Seton H. O'Brien

Seton H. O'Brien (Bar No. 247732017)  
Stephanie L. Silvano (Bar No. 168182016)  
Grace E. Hart (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue, 47th Floor  
New York, NY 10166  
Telephone: (212) 351-4000  
Facsimile: (212)351-4035  
SSilvano@gibsondunn.com  
GHart@gibsondunn.com

Greta B. Williams (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
1700 M Street, N.W.  
Washington, DC 20036  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
GBWilliams@gibsondunn.com

Heather L. Richardson (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: (213) 229-7000  
Facsimile: (213) 229-7520  
HRichardson@gibsondunn.com

*Attorneys for Defendant Wipro Limited*